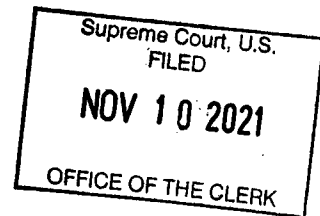


No. **21-6267**

ORIGINAL

In the
Supreme Court of the United States



ADRIENNE BROWN-MALLARD

Petitioner

v.

POTOMAC CONCRETE CO., INC.,

CREATIVE LANDSCAPES BY GREGORY Respondents

On Petition for Writ of Certiorari
To The Court of Special Appeals of Maryland

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

This extreme violative case significantly challenges multiple Constitutional and Federal laws. On appeal, Petitioner presented trial court reversible offenses willfully made by those in law detailed in briefs, court transcript, and filings. Opinion omitting Constitutional and Federal violations removing the essence of appeal, consequently conflicting with laws denying Petitioner her born Constitutional rights. The level of willful collaborative efforts surpassing intent to deny Petitioner's rights demonstrate Civil Rights Act of 1964 violations based on race, gender, and pro se.

The Questions Presented are:

1. Whether the use of peremptory challenges removing available potential jurors of both the same race and same gender (White Men, White Women, also Black Men) from the jury pool, and selecting 6 jurors with 5 having the same race and same gender (5 Black Women), violates the Fifth Amendment through the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution? Whether this conflicts with the U.S. Supreme Court ruling on *Batson v. Kentucky* and *J.E.B. v. Alabama*?
2. Whether trial judge erred selecting three jurors (#13, #17, #18 per court transcript) not asked any examining questions, not involved in voir dire, jury selection process and appearing in transcript after trial judge selected jurors deprives Petitioner her born constitutional rights to the 5th Amendment through the Due Process Clause of the 14th Amendment? Whether trial attorneys being officers of the court, obligated to promote justice, uphold the law, and their Constitutional Oath, not objecting to well-known jurors not questioned during jury selection and selected as jurors should be held accountable for harm?
3. Significance with daily public safety stairway use nationwide, preventing injuries, and building codes. This liability case involves only two-steps constructed each by the Respondents. A Respondent confessed to State and National code violations (color contrast – riser heights – pattern – handrail), admitted repairing steps and detailed how. Whether both bonded steps and both contractors should have been equally heard at trial to compare, measure, and consider National/State Builder code violations and liability to prove negligence and causation? Whether trial judge abused discretion removing one of the only two steps causing a massive domino effect removal of Petitioner's crucial evidence, depriving Due Process under the 5th and 14th

Amendment? Whether a porch/stoop is considered a step if bonded to another step creating stairway?

4. Whether Appellate Court opinion **leaving out, swaying, and navigating from** the nature of Petitioners appeal, ignoring trial court Constitutional and Federal offenses, conflict with 18 U.S.C. 1001 willful concealment, with intent to mislead, design to induce belief in the falsity, the 5th Amendment through the Due Process Clause of the 14th Amendment, The Color of Law Title 18, and U.S Department of Justice 910?
5. Whether the willful combination of errors and increasing collaborative efforts from those in law, educated in law-knowing the law, surpassing their intent to deny my born Constitutional rights to Due Process and Substantive Due Process demonstrate and challenges THE COLOR OF LAW – by collaborating, CIVIL RIGHTS ACT 1964 – based on my race – gender – pro se, RACIAL SEGREGATION – from systematic separation of Blacks/other minorities in receiving harmful, disproportionate, and violative court errors and rulings gone unchecked, another form of SLAVERY – deprivation of rights (free but not free). MODERN SLAVERY – severe exploitation of others for personal gains, also Crimes Against Humanity – causing minority citizens in court great harm and disparities?
6. Whether Pro se cases are harmed on appeal when trial attorney did not zealously represent nor protect case? If pro se do not have protective rights under the law from attorneys' errors or judicial hostility, an authoritative decision from the U.S. Supreme Court would surely protect pro se citizens' rights nationwide?

LIST OF PARTIES

**POTOMAC CONCRETE CO., INC.,
CREATIVE LANDSCAPES BY GREGORY Respondents**

RELATED CASES

**Court of Appeals of Maryland (No. 3030, Sept. Term, 2018 No. 479/Term
2020)**

Court of Special Appeals of Maryland (No. CAL1713531)

Prince George's County Circuit Court (CAL 17-13531)

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No. _____

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POTOMAC CONCRETE CO., INC.

CREATIVE LANDSCAPES BY GREGORY

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO
THE COURT OF SPECIAL APPEALS OF MARYLAND

PETITION FOR A WRIT OF CERTIORARI

OPINIONS BELOW

**The Opinion of the Court of Special Appeals of Maryland (No.
CAL1713531) Unpublished**

JURISDICTION

The Order of the Court of Appeals of Maryland was entered on June 22,
2021.

The Opinion of the Court of Special Appeals of Maryland was entered on
January 6, 2021.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution, Amendment XIV:

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

United States Constitution, Amendment VIII: Against cruel and unusual punishment.

United States Constitution, Amendment VI: Fair trial, Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any state to the contrary notwithstanding.

Article 7 of the 1966 International Covenant of Civil and Political Rights states that: "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment."

Article 10 (1) states that: "All persons deprived of their liberty shall be treated with humanity and with respect for the inherent..."

Haines v. Kerner 404 U.S. 520 (1971), ... Supreme Court found that **pro se pleadings** should be held to "less stringent standards" than those drafted by attorneys

Title 18 U.S.C. Section 241 - Conspiracy Against Rights, this statute makes it unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or **enjoyment of any right or privilege** secured to him/her by the **Constitution** or the laws of the United States, (or because of his/her having exercised the same).

Title 18 U.S.C. Section 242 - Deprivation of Rights Under Color of Law, along with prohibiting willfully depriving a person of their rights and protections of law, it further prohibits to willfully **subject or cause any person to different punishments, pains, or penalties...** of citizens on account of **his/her color or race...** by federal, state, or local **officials** within the bounds or limits of their lawful authority, but also acts done without

and beyond the bounds of their lawful authority... individuals such as Mayors, **Council persons, Judges, ... persons who are bound by laws, statutes ordinances, or customs.**

Title 18, U.S.C., Section 245 - Federally Protected Activities

1) This statute prohibits **willful injury, intimidation, or interference, or attempt to do so, by force or threat of force** of any person or **class** of persons because of their activity as: g. a participant in any benefit, service, privilege, program, facility, or activity provided or **administered by the United States**; j. a participant in any program or activity receiving **Federal financial assistance**.⁴⁹

2) Prohibits willful injury, intimidation, or interference or attempt to do so, by force or threat of force of any person because of **race**, color, religion, or national origin and because of his/her activity as: h. a participant in any benefit, service, privilege, program, facility, or activity provided or **administered by a state or local government**; m. a patron of any public accommodation, including hotels, motels, restaurants, lunchrooms, bars, gas stations, theaters...or any other **establishment which serves the public** and which is principally engaged in selling food or beverages for consumption on the premises.

3) Prohibits interference by force or threat of force against any person because he/she is or has been, or in **order to intimidate** such person or any other person or class of persons from participating or affording others the **opportunity or protection** to so participate, or lawfully aiding or encouraging other persons to participate in any of the benefits or activities listed in items (1) and (2), above **without discrimination** as to race, color, religion, or national origin.

U.S. Department of **Justice 910. Knowingly and willfully**, the prohibition of **18 U.S.C. 1001** requires that the false statement, concealment or cover up be “knowingly and willfully” done, the 43 statement must have been made with intent to deceive, a design to induce belief in the falsity or to mislead.

The Constitution of India under Articles 32 and 226 gives power to the Supreme Court and High Courts respectively to issue writs in cases of breach of Fundamental Rights of any citizen by the State. Such writs prevent arbitrariness and unchecked use of power.

“A Writ issued by a court to compel performance of a particular act by lower court or governmental officer or body, to correct a prior action or failure to act.”

Black’s law dictionary[1].

STATEMENT OF THE CASE

A straight-forward liability case involving multiple fractures, nerve damages, life-long injuries, life-long work restrictions, and drastic change of life the Petitioner sustained from defective steps at work violating National and State Building Codes – color contrast, riser height, pattern, and no handrail at a place of business.

Along with substantial evidence, code violations, and pictures with measurements verifying violations, Respondent confessed to code violations, admitted to repairing faulty step in deposition and detailed how.

Even so, this case Quickly turned aggressively unethical and violative, all coming to a head and playing out the week of trial, worsening the morning of the first day of trial, turning critical with unnecessary willful layering of Constitutional trial violations, developing into Federal violations by those in law knowing the law, with willful collaborations, finessing, and concealment challenging our U.S. Constitution, State and Federal Laws, *The Color of Law Title 18 U.S.C. Section 241 Conspiracy Against Rights*, and *Title 18 U.S.C. Section 242 Deprivation of Rights* denying Petitioner her natural born U.S. Constitutional protection of rights under the 5th Amendment through the Due Process Clause of the 14th Amendment.

This 2018 trial was a mistrial over and over and over again.

Throughout appeals, knowledge of willfully disobeyed rules and laws by those in law reviled. Unfortunately, at trial I did not know and relied on my attorney as citizens generally do. Suffering around 30 diagnosed injuries, in a lot of pain with leg spasms at

trial and seeing the escalated level and number of violations, most blatantly from trial judge. Unnecessary, but why?

The answer lies withing the intent to harm and deprive this case.

Case filed in 2017. Trail dates October 29 - 31, 2018.

Case derived from my June 6, 2014, Part-Time position work injuries, from multi-colored trickery steps violating National and State builder codes. I had two other jobs as well. All I did was go to work, not knowing my life would permanently be flipped inside out from multiple Life-Long injuries... and then shredded by judicial violations on multiple levels for the benefit of others.

Working at a new home's community, I fell down uneven / multicolored steps violating building codes. Around 30 diagnosed injuries on all four-limbs, left fractures twice spiraling around leg and through entire ankle dangling, left foot fracture, severely sprained right ankle, left knee injury, left hip injury, Plankter Fasciitis, Chronic Regional Pain Syndrome Stage II, Tibias Tendinitis Stage II, several others including multiple nerve damages, and Left and Right Wrist Carpal Tunnel Syndrome presently needing surgery.

In cast up to knee with crutches for 4+ Months, had to be taught how to walk all over again as if I never walked, ran, or danced. During trial (2018), it was stated I had over 100 doctor appointments and physical therapy.

Insurmountable pain, along with an unfamiliar life struggling with little to no income and everything getting cut-off from Life-Long injuries and Life-Long disabilities. I had 3 jobs at time of injuries.

Case History

Then trial attorney Kevin Finnegan filed lawsuit on my behalf against the new home's builder in 2017.

As citizens, we trust our attorneys would protect our rights and look out for our best interest. We do not know the law.

Mr. Finnegan (without informing me) dropped lawsuit against the new homes builder and brings in both Respondents after the new home's builder gave them up.

Both Defendants filed Crossclaims against each other in 2017.

This liability case involves ONLY TWO (2) STEPS. One constructed by each Respondent. Bonded together creating 1-stairway in front of the model home door. Not two staircases referred to in Court of Special Appeals of Maryland opinion. Just 2-steps.

According to National and Maryland Building Codes (appendix).

1. Steps are to be the same height, no more than 3/8 of an inch difference (less than 1/4 -inch). 1st step 6-inches, 2nd step 5-inches - Code Violations.
2. Steps are to have good color contrast. Being the same color. They have two different colors-Code Violations.
3. Steps are to have the same pattern. They have two different patterns-Code violations. Nor did they have final steps inspected. Lack of care.
4. Steps are to have a handrail at a place of business. It did not-Code violations.

Respondent Potomac Concrete, Co. (PCC) constructed the White/Cement stoop (porch)-the 1st step descending. However, opposite from also constructing a 2nd cement step and cement sidewalk like PCC did for over 100 homes in that very same community, they chose to only construct the cement stoop, leaving about a 14-inch Drop-Down off stoop in front of the door, just left without any concern. Why? (Appx Steps 1).

Respondent Creative Landscape by Gregory (CLG), Inc. constructed the Red/Brick sidewalk with a landing area circular red brick design patterns blending together with CLG also constructed Red/Brick step they attached/bonded to PCC White/Cement stoop. (Appx Steps 2).

Creating 1-stairway with 2-steps in front of door.

CLG confessed to violating building codes for Color Contrast, Pattern and Height, admitted to repairing step after knowledge of Petitioners injuries. Trial verified handrail needed, CLG's Supervisor of Masonry and Hardscaping testified that CLG brick step did not conform with riser heights and did not have a strong color contrast.

July 12, 2018 testimony/deposition CLG Steven Kenel, Corporate Designee (1p. 5, E. 6).

A- Oscar Lopez is the landscape foreman who was on the job when we were informed about someone had fallen... June 2017.

A- I wanted him to go and find out what the problem was.

Q- And who did you expect him to ask?

A- Mark Dick

Q- Did he ever find anything out from Mark Dick? 7

A- Yes.

Q -And what did he learn, do you know?

A- That there was a problem with the steps. There was a slight deviation in the distance.

Q- You mean the riser step height?

A- Yes.

Q- Do you know what that deviation was?

A- From what he told me it was a total of three quarter of an inch.

Q- Have you ever had a conversation with Jason Thomas from Cal Atlantic about the riser height issue in front of 12511 Brick Yard Boulevard?

A- Only the day he called me & said there's a problem. We need to fix it.

Clearly, after CLG receiving word of Plaintiff injuries from Cal Atlantic Builders and instructed to "FIX IT. Admitting steps were not in compliance with codes (requires no more than a 3/8 of a difference). Difference was 1-inch.

The harmful results of willful flagrant legal errors by those in law, knowing the law and knowing what is illegal, is the cause of this case lengthy terrorizing appeals and the cause of this petition to the U.S. Supreme Court in hopes for authoritative corrections and to finally honor the protections of the Petitioners born Constitutional Rights.

Scheuer v. Rhodes, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974) The U.S. Supreme Court stated, "...When a judge acts as a trespasser of the law... when a state officer acts under a state law in a manner violative of the Federal Constitution, he comes into conflict with the superior authority of that Constitution."

Jury Selection

The Equal Protection Clause of the Fourteenth Amendment provides both sides have the right to an impartial jury, free from racial, ethnic, or gender discrimination. Peremptory challenges removed available potential jurors from jury pool having both the same race and same gender in the following categories – White Men, White Women, also Black Men.

Moreover, trial judge selected jurors with the same race and gender in a different category – Black Females. Out of the 6 jurors selected, 5 were Black Females. Petitioner has been addressing these issues since her 2017 filing for a new trial one week after verdict.

The *Batson v. Kentucky* 476 U.S. 79 (1986) landmark case visits peremptory challenges removing potential jurors because of race. The U. S. Supreme Court agreed use of peremptory challenges to remove potential jurors based on race violates the Equal Protection Clause of the Fourteenth Amendment to the Constitution. In a 7-2 decision, this honorable Court held defendant is not entitled to a jury partially or completely composed of people of his/her own race. Justice Thurgood Marshall agreed. Stated, with the current system, prosecutors are still free to discriminate as long as it is not blatant.

J.E.B. v. Alabama 511 U.S. 127 (1994) case visits peremptory challenges removing potential jurors because of gender. The U.S. Supreme Court agreed, prohibiting use to remove jurors based on gender.

Edmonson v. Leesville Concrete Co., Inc. 500 U.S. 614 (1991), case visits peremptory challenges removing potential jurors because of race in civil cases. Standard extended to civil trials. U.S. Supreme Court held private litigant in civil cases may not use peremptory challenges to exclude jurors on account of race.

Petitioner is directly injured by trial courts aggressive, blatant, and discriminatory gross misuse of peremptory challenges by denying Petitioner her born citizens right

under the United States Constitution, including her Civil Rights. Trial court not only harmed Petitioner, but also disobeyed and challenges the U.S. Supreme Court rulings. Not only eliminated juror of one race or one gender, trial court also willfully escalated violations by directly eliminated both race and gender in this civil case, in addition to other Constitutional and Federal violations in this one case, making this case significantly disadvantageous and extreme.

Strauder v. West Virginia 100 U.S. 300 (1880), a landmark Supreme Court decision about racial discrimination and the U.S. Constitution. 14th Amendment right to exemption from unfriendly legislation against them distinctively as colored, exemption from discriminations, imposed by public authority

Peremptory challenges should result in non-predisposed, balanced group of potential jurors. Often abused permitting parties to remove prospective jurors based on their race without giving reason, violating the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, prohibiting the exercise of peremptory challenges based upon group stereotyping.

Invidious discrimination in the use of peremptory challenges based on race or gender insults the Equal Protection Clause, courts, and all involved in the jury selection process, along with damaging U.S. citizens perception of a fair and just jury system, often questioning fair and impartial trials and outcomes.

During this trials jury selection, both sides received 5 strikes each. Trial judge asked basically the same questions to potential jurors. At bench, (per court transcript) both Petitioner (then) trial attorney and Respondents CLG attorney Mr. Daily conversations with trial judge, seemed to all three be on one accord, as if they were deciding where to go for lunch. The focus was mostly on the shortage of potential jurors. As Mr. Finnegan gave trial judge his 5 strikes (3, I requested him not to strike), immediately trial judge calls the selected jurors. Selected 5 out of 6 having the same race and gender.

However, the same race and genders of available potential jurors were excluded by peremptory/strikes (totaling 10), along with potential jurors who were not able or not selected. Also, the trial judge moved trial to start at 10:00am knowing most of the jurors have already been selected.

Petitioner had absolutely no chance for a fair trial with the goings-on.

Further jury selection/voir dire harmful, willful, and direct violations. How did 3 jurors, #13, #17, #18 not involved with the jury selection process pop-up and appear as jurors? Per PGCCC transcript, the 3 potential jurors were never asked, nor answered any of the trial judge examining questions, never mentioned by either attorney or trial judge during bench meetings throughout jury deliberation, only appearing in transcript when

called and selected by judge Lombardi as jurors? All attorneys involved must have known jurors #13, #17, #18 were never asked/answered any questions, and did not object.

The level of Judicial Abuse in this case and the extreme comfort level with numerous Judicial Misconduct from those in law in this case is frightening and alarming. I am extremely uncomfortable, unwillingly being in the middle of this. I am 54 years old and cannot recall seeing this type of corruption in my lifetime... until this. Unbelievable, extremely unsettling, and abusive. This would not be happening to citizens if courts were held accountable.

Citizens nationwide come to court to resolve issues fairly, according to the Rule of Law. Not to have courts add their violations and dump them on us, cover-up for their benefit, and get away with it. Myself, I am just numb after 7+ Years.

Trial judge's position, willful, knowledgeable, abuse of law, and discretion, with clear and blatant intent to Unconstitutionally manipulate the outcome of this case throughout trial, is a vicious attack towards our justice system and Petitioner's protections under 14th Amendment Due Process Clause, the U.S. Constitution, and Title 18 U.S.C. Section 242 - Deprivation of Rights Under Color of Law, and Title 18 U.S.C. Section 245 - Federally Protected Activities.

Trial Events

Disturbing Events During Week of Trial (October 29-31, 2018) suggest collaboration:

- 2017 Petitioner filed suit against PCC and CLG.
- 2017 Respondent PCC filed suit against Respondent CLG.

- Throughout, motions and briefs filed on this case, and suit between PCC against CLG.
- Five (5) days before trial, Petitioner's attorney informs her PCC offered a \$500,000 settlement.
- Three (3) days before trial, PCC files sanctions for \$26,000 against Petitioner (?).
- Three (3) days before trial, CLG untimely files to remove any talks of RISER HEIGHTS (same day).
- Morning of trial, PCC files removing \$26,000 sanctions against me (3 days after filing).
- Morning of trial, PCC and CLG both dismisses lawsuits against each other after over a year of fighting (?).
- Morning of trial, three jurors selected not involved in the jury selection. Jurors #13, #17, #18 never mentioned in transcript until the Judge selected and called them to jury stand.
- Morning of trial, the Judge addressed PCC 2nd summary judgment (without new evidence). PCC attorney said he spoke to Petitioner's (then) attorney Mr. Finnegan (unbeknownst to Petitioner) stating he has no dispute to material evidence. Petitioner challenged Mr. Finnegan for a duration of time in courtroom asking what about briefs filed, meanwhile trial judge kept asking attorney Finnegan if he said that. Finnegan replied twice looking down "I refer to my briefs written" and said nothing else. Without trial judge going over briefs/evidence/motions or concerned about Petitioner protection of rights-still worried/challenging her own attorney at table, the Judge quickly **grants** PCC 2nd summary judgment and dismisses them from case, removing 1 of only 2 steps.
- Morning of trial, the Judge addresses CLG untimely filed motion to remove any talks of Riser Heights. Petitioners' attorney was quiet and did not argue any points. Trial judge **granted** CLG motion. Need 2 to compare for code violations/riser heights are steps.
- Morning of trial, trial judge and clerk allowed CLG attorney to submit evidence without recording or numbering them. Said he would number during lunch.
- Last day of trial, trial judge did not read jury instructions, while conversating with jurors before deliberation, kept referring to Respondents as the "*Corporation*" not the Defendant. Objected by CLG, judge further states doing this for a reason, he doesn't want them (jurors) to discriminate against him (Defendant).
- Last day of trial, deliberating jurors return asking the judge three question (per Mr. Finnegan), no answer to jurors, told get back in make a decision, however, this U.S. courtroom proceeding was never docketed, nor recorded, and not in court transcript. Courtroom witnesses. (Petitioner filed Affidavit concerning this violation of her rights).

Constitutional Oaths of attorney and judge. Another Constitutional violation.

The attorney Oath on Admission. AO 153 - Oath on Admission – USCourts.gov I, do solemnly swear (or affirm) that as an attorney and as a counselor of this court I will conduct myself uprightly and according to law, and that I will support the constitution of the United States.

28 U.S. Code § 453. Oaths of justices and judges. Each justice or judge of the United States shall take the following oath or affirmation before performing the duties of his office: "I, ____, do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as ____ under the Constitution and laws of the United States. So help me God."

Further details. The morning of trial October 29, 2018, Prince Georges County Circuit Court (PGCCC) judge James Lombardi visits PCC September 11, 2018 Motion for Reconsideration/Summary Judgment filed 3-weeks after PCC previous Summary Judgment Denied on August 21, 2018. Both Summary Judgments failed to provide any new evidence/information. If PCC based their September 11, 2018 Motion for Reconsideration on the scheduled August 27, 2018 deposition, that deposition was Amended/Rescheduled for October 8, 2018. After PCC Motion for Reconsideration. Again, no new evidence.

PCC September Motion for Reconsideration referred heavily on CLG acknowledging they built red brick step (2nd step) attached to PCC concrete stoop, and PCC built concrete stoop (1st step). However, this was all well-established Since case 2017 filing including both Respondents involvement on State and National Code Violations (color/height/pattern/handrail) from both bonded and dangerously constructed stairway.

PCC and CLG dangerously neglected and disobeyed color contrast, a unified pattern, and height consistencies violated both Maryland and National codes, causing my Life-Long disabilities.

Here is where the disturbing events from the above chart began to play out at trial. The beginning of trial, PCC attorney states to trial judge he spoke with Petitioners then "attorney" Kevin Finnegan (Petitioner unaware of conversation). Finnegan then states to judge, "he has no objection to material evidence with PCC." Petitioner not knowing what that meant, but feeling like something was terribly wrong, challenged Finnegan in court asking, "what is going on?" "What about all your written briefs objecting to everything for a year...?" Interestingly, not in transcript with the mic on table in courtroom only transcribing Mr. Finnegan. Judge Lombardi kept asking Finnegan, you have no objection? Kevin could not look judge face to face, stating (twice in transcript), "I refer to my briefs filed," while judge Lombardi pressuring him on material evidence.

Trial judge quickly dismisses PCC from case without fact finding nor asking/concerned with apparent attorney client disagreement in front of him. Now, adding to the collusion offending Title 18, U.S.C., Section 241 attorney is dishonest and flipping against clients Due Process, rights to be inform, and zealously fight for client, not join in to oppress case while trial judge dismantles substantial case evidence favoring Mr. Finnegan's side. Trial court depriving Petitioner the 5th Amendment through the Due

Process Clause of the 14th Amendment, and The Color of Law Title 18, U.S.C., Section 242.

Trial attorney flips without informing client his intent to change.).

PCC was in fact aware of disputed material facts against them before trial from a year of filed motions. In their own filed Motion for Reconsideration prior to trial. Mistakenly said there were none at beginning of trial and wrongfully removed. Importantly, PCC actually cited Petitioner's brief arguing disputed facts against PCC in PCC's very own Motion for Reconsideration stating...

Plaintiff argues that, *"a reasonable jury could determine that the defendants (1) failed to ensure the step tread riser heights met the code requirements for uniformity: (2) violated the requirement to have a strong color contrast on all steps: (3) violated the code requirement for at least one handrail on the subject steps: and (4) that the purpose of these code requirements are to protect the public, which includes Ms. Mallard."*

Judge Lombardi continues to dismantle case evidence, granting CLG untimely filed motion to omit any talks on RISER HEIGHTS. This is a liability case involving Stair Code Violations. Further abuse of discretions.

Scheuer v. Rhodes, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974) **The U.S. Supreme Court**, *"...When a judge acts as a trespasser of the law...the judge loses subject-matter jurisdiction and the judges orders are void, of no legal force or effect."*

Steps are Riser Heights. State and National codes cannot be compared for violations without 2 or more steps. Basic common sense in comparing and could be the reason for removing PCC which consequently hides both Respondents dangerous neglectful errors without resolve or corrections for the public.

Excessive and unethical removal of court evidence. Now left with only One-Step to awkwardly begin a liability trial concerning stair riser violation and negligence, deprived ability to compare steps color contrast and height variance to prove code violations and liability by negligence to the court and jurors.

The brutal 3-DAY trial rushed by judge. Displayed harsh bias, yelling at Petitioners then trial attorney in front of jurors while politely and calmly addressing Respondents CLG attorney, trial courts blatant disrespect of the U.S. Constitution, while my family and I sat helplessly in a U.S. courtroom watching in dismay.

Court transcript displaying the courtroom confusion trying to awkwardly start a liability trail proving neglect with code violations that now cannot be compared with only 1-Step.

Adding further confusion, CLG attorney Frank F. Daily discussing his evidence #3, #4 and possibly #5 without admitting them into evidence. Kevin Finnegan Objected to Clerk not recording evidence. Frank Daily stated he will mark them during lunch break, per transcript. Trial Judge and clerk seemed to be fine with this rule violated as well. The Judge, both attorneys and witness (Gregory Harrison) were confused (forget me, this case was already decided on), not knowing the numbers of each piece of evidence from the Court Clerk not admitting into evidence and numbering them. No one knew what evidence was what, along with the unorthodox trial on ONE STEP.

Penhallow v. Doane's Administrators (3 U.S. 54; 1 L.Ed. 57; 3 Dall. 54), "The prosecutor is not a witness; and he should not be permitted to add to the record either by subtle or

gross improprieties. Those who have experienced the full thrust of the power of government when leveled against them know that the only protection the citizen has is in the requirement for a fair trial." <https://supreme.justia.com/cases/federal/us/3/54/6>.

Judge allowing Defense attorney to present unadmitted/unrecorded evidence at trial is Unconstitutional. Court Rules not followed, in my case. The 2nd time Trial Court Clerk did not Record or Docket. One of the many reversible offences.

U.S. Supreme Court. Nudd v. Burrows, 91 U.S 426. "Fraud vitiates everything."

Per court Transcript: The Judge did not read the Maryland Patterned Jury Instructions. He just had a conversation. Mr. Finnegan did Object to this. Defense attorney walked to bench and said he is joining in on Objection. The Judge asked for what, CLG attorney responded, you are referring to my client as the "CORPORATION," and not the Defendant to the jurors. Judge Lombardi responds, *"Well, you know, I did that for a reason... don't want them (jurors) to discriminate (against Defendant)."*

Judge deviating from instruction to persuade jurors *"If you say no (to #1)... knock on the door... case is over... but if you say yes... then that's not enough..."* *United States v. Rowe, 106 F.3d 1226 (5th Cir. 1997)* *This conduct on part of the judge tainted the entire panel. The judge's abuse of the juror would have led other jurors not to be honest in answering voir dire questions.*

Deliberating Jurors

Court contacted Mr. Finnegan informing jurors are returning. He comes to our table (at same restaurant) says jurors returning, we have to go. We all leave. My family and I are in long security line (lunch-time).

Walking in courtroom, Mr. Finnegan walks out, said it's over! My family and I asked, what do you mean? He said juror had three questions. I said why did you not wait for me in security line? They waited 3 hours and held up trial for juror #13 (same appearing juror not involved with jury selection process, judge didn't ask her any questions, also awful attitude who did not want to return 2nd day). We asked what were the three questions? Kevin said... What type of shoes I had on? Why did I file late? Why did the defense find out late?

None of the juror questions pertained to evidence, law, facts, "jury instructions." Seem to be reaching, ignoring CLG confessed code violations and repairing. We asked what did the judge say? Kevin said judge told jurors they have all the evidence they need, get back in and make a decision! Questions were never answered nor explained. Jury questions can prove jury bias. Persuaded by judge.

Note: After receiving court transcript, showed no record of Jurors Returned from deliberation to courtroom with Questions. PGCCC, Judge Lombardi and Clerk disobeyed Maryland *Rule 2-521* by not Docketing, nor Recording deliberating jurors three questions to the court. Nor did jurors receive an answer from the judge. Happened right here in the United States Court.

893. MD. R.P. 2-521(c). *Court responds to jury request to review evidence and for communications. All communication between judge and jury must be on the record or in writing and filed in the action.*

894. Id. (b), (c). *Court to notify parties of the receipt of any communication from the jury before responding to it.*

With Respondent CLG having no supportive evidence only code violations and confessions, the unfavorable verdict did not apply the law or trial evidence. My family and I watched helplessly in disbelief of the court's oppression.

As my family and I walked out of the courtroom after the verdict, I told them, *"This trial was decided on before I even stepped foot into this courtroom, the first day."* My Mother said this is like the OJ trial.

Court of Special Appeals of Maryland

Dates given to me by Prince Georges County Circuit Court for the transcript. I was told the times had excessive on/off. Might explain missing court events or other unexplained or questionable trial occurrences.

Hearing Date: 10/29/2019

Times: 10:19 to 11:04, 11:20 to 12:21, 12:28 to 12:37, 1:41 to 3:07, 3:13 to 3:17, 3:19 to 4:23

Hearing Date: 10/30/2019

Times: 10:27 to 12:51, 2:09 to 3:31, 3:42 to 3:49

Hearing Date: 10/31/2019

Times: 10:15 to 10:54, 11:01 to 11:04, 11:17 to 12:45, 3:50 to 3:50

Once receiving transcript, Petitioner immediately looked for the deliberating juror's communication with court to return to courtroom, and jurors 3-questions to court and found. Another layer of Judicial Misconduct/Errors denying my Due Process.

Transcript confirms intent to deny Petitioner Due Process and disproportionate treatment. Imagine if we had entire transcript, not just what is allowed. Why the willful violations in this case? I do not like any involvement with this at all. The transcript is ridden with shocking Federal and Constitutional violations, unknown to me (Petitioner) until receiving, reading transcript, and researching the law. Further violations were made by trial judge and attorneys from both sides at bench, of which I was not privy to hear at trial, learned from transcript. As pro se now, I could not have preserved at trial without being at the bench. Pro se on appeal once having trial attorney should have protections.

Petitioner's lawful protection of Rights continued to be denied throughout appeal, intensifying with additional parties and concealments obstructing Constitutional and Federal statutory rights, continuing no possible chance to a fair appeal?

Items Omitted from Court of Special Appeals of Maryland (CSAM) Opinion.

Deceives the nature of appeal, intentionally avoiding the most critical and Constitutional violations, U.S. Department of Justice 910, Title 18 U.S.C. Section 241 conspiracy against rights, and the prohibition of 18 U.S.C. 1001 with direct intent to mislead case issues.

1. Per court transcripts: Jurors #13, #17, #18 were not involved in the Jury Selection process. Trial judge, nor attorneys ask the 3 jurors questions. 3 jurors did not answer or make statements, violating voir dire and Federal Civil Procedure Rule 47-Selecting Jurors. No transcript record of the three until Judge selected them as jurors.
2. Trial judge selected 6 jurors (including #13, #17, #18 excluded from voir dire) after Kevin Finnegan and Defense attorney both submitted their 5-stikes. Peremptory challenges removed both the same race and same genders – White Men, White Women, also Black Men from jury pool. Trial judge selected 6 jurors consisting of 5 Black Women (same race and gender). Removing available White Men, White Women, Black Men, and selecting 5 of 6 jurors of the same race and gender is not a suitable criterion for striking jurors, challenges the United States Supreme Court

ruling on both *Batson v. Kentucky*, *Edmonson v. Leesville Concrete*, and *J.E.B. v. Alabama* “*Discrimination in jury selection, whether based on race or on gender, causes harm to the litigants, the community, and individual jurors who are wrongfully excluded...*”

3. Per court transcripts: The judge did not read Maryland Pattern Jury Instructions to jurors. Objected. He just conversated with jurors before deliberation and kept referred to Defendant as the “Corporation.” CLG Respondent joined Objection at bench, stating trial judge keeps referring to his client as “*the Corporation*” and not the Defendant. Trial judge said he is doing this for a reason... didn’t want them (jurors) to discriminate against him (Defendant).
4. Per court transcript: Deliberating jurors retuning to courtroom asking the judge three questions, not in transcripts. This U.S. courtroom proceeding was never docketed, nor recorded with defense attorney’s Mr. Daily, Kevin Finnegan attorney, clerk, trial judge, and jurors all in attendance. Violating Maryland Rule 2-521. Petitioner file **Affidavit** concerning this matter.
5. Trial judge massive removal of Petitioners crucial case evidence by removing one of the only two-steps beginning of trial. Leaving only **one-step to begin a liability trial** with code violations is discriminatory and excessive abuse of discretion infringes on Petitioners Due Process rights. Transcript displays a collaborative effort.

U.S. Supreme Court. Nudd v. Burrows, 91 U.S 426. “Fraud vitiates everything.”

In my request for reconsideration to PGCCC one week after trial in 2018 (Appx Motion for New Trial), I argued deliberating jurors returning to courtroom asking the court 3-questions and stated jurors questions can prove bias.

And I thought that was a major issue in 2018...

This level of violation is not new and is a known comfort level. People only do what they know they can get away with, at the cost of Maryland citizens’ rights..

At the same time, Petitioner is experiencing 7+ years of nearly identical extreme court Judicial Misconduct, violative of the Constitutional and Federal-The Color of Law

in a neighboring state with Commissioner awarding me multiple workers compensation medical awards but refuses to enforce their very own Awards/Opinions refusing my medicals past 2 years, on appeal. Unlawful and Horrifying. After 7+ years affected by both state courts unchecked abuse, I can say both cases violate Human Rights, and is a form of abuse, terrorism, intimidation, and also slavery, with worsening retaliatory actions even in the face of Petitioning that case to the U.S. Supreme Court 19-6782.

As a U.S. citizen, this is utterly terrorizing to be forced to experience, suffering dearly through Unconstitutional and disproportionate cases, missing over 7 years of my life while those in law and experienced in law willfully and carelessly manipulate courts and misuse their titles to favor a specific outcome or whatever reason. Seeking help in court, instead made unwilling consequences to protect those in law (violating laws) offensive actions and careers. Neglecting the Rule of Law, their Constitutional OATH, using my case and others as a platform for their abuse, harming citizens and the judicial system. All I did was just go to work.

THIS comes from human behavior and abuse of "power" conducting the law. Not properly managing authority.

On Appeal, forced into Pro Se (well known the average person cannot afford an appellate attorney), I argued my 14th Amendment, Due Process of Rights to a fair trial, detailing trial courts Judicial Misconducts, unfairly dismantling my case evidence not affording me a fair trial. Almost as if they were trying to make playing field even for the

Defense. Exhibits include my briefs written to Court of Special Appeals of Maryland, my Petitions and Supplements all in appendix.

According to Haines v. Kerner, 404 U.S. 520 (1971), ... *Supreme Court found that pro se pleadings should be held to "less stringent standards" than those drafted by attorneys.*

Amazingly, no Appellate decision/Opinion made on my argued points on the U.S. Constitution Rights to a fair trial, torture abusive, obstruction of justice, and totally avoided Judicial Misconducts and Constitutional errors. Especially the deliberating jurors returning asking 3 questions Not Docketed, Nor Recorded, not addressed in CSAM opinion at all.

Opinion omitting the true essence of trial details distorts this case and misleads the facts for people reading CSAM opinion. (Appendix. CSAM Opinion, Response Brief to PCC, & Response Brief to CLG).

18 U.S.C. 1001, known/willful false statement, concealment, cover-up, done with intent to deceive, mislead, design to induce belief in the falsity.

Court of Appeals of Maryland (CAM)

Petitioner petitioned CAM, decision not to hear. Plaintiffs Motion for Reconsideration filed May 3, 2021 and May 17, 2021 (Appendix Motion for Reconsideration) (Appendix Motion for Reconsideration S Opinion-Steps Caused Injuries) displays further evidence proving both Respondents faulty constructions caused injury cited in the Virginia Workers Compensation Commission. Supplement provides another Courts Opinion implicating the cause of Petitioners fall/Life-Long injuries are the

dangerous optical-illusion steps constructed by both liable Respondents. The fact the Commission realizes that steps are not looked at as a risk of employment, but nevertheless the Deputy Commissioner acknowledges in my case the conditions of Respondents steps created the risk of employment is highly significant and should be assessed in the reconsideration of merits.

CSAM opinion omitting Petitioners issues on Constitutional matters is destructive on appeal, by intentionally choosing to misstate Petitioners appealed issues, hinders further appeals. With Constitutional issues presented and avoided by CSAM, proves existence of Federal and Constitutional violations Title 18, U.S.C., Section 241 **Conspiracy Against Rights** Title 18, U.S.C., Section 242 **Deprivation of Rights, Constitutional denial**, Title 18, U.S.C., Section 245 Federally Protected Activities, and 18 U.S.C. 1001 false statement, concealment or cover up be “knowingly and willfully” done with proof in Opinion having clear intent to deceive, influencing falsity, still merits exist.

My statements, Briefs and Petitions by law weigh just as much, as well, and are to be heard.

Barricading justice in this case Unconstitutionally avoiding all my Constitutional question. Unlawfully and willfully puts this highly aggressive and abusive case in an unfair position on appeal without a Constitutional decision made to be reviewed. Trial Courts tremendous willful errors against this case has gone without correction.

What are citizens to do when we fully exhaust every level of appeal, trial attorney didn't protect case, pro se are taken advantage of, our presented and argued issues are ignored on appeal, and court opinions designed as issues do not exist? Who protects us?

I learned a little about law in the past 7+ years. As citizens, we come to the courts seeking help, ethical, equal, and fair guidance to resolve issues. Courts resolve disputes and fairly weigh evidence. Appellate courts are to correct lower courts infractions. I never could have fathomed the multitude and level of judicial violations in just this one case. Moreover, specific Constitutional and Federal violations presented in appellate courts willfully dismissively overlooked, dumping court errors on my lap, and walking away. Court's violations are to be corrected and are not mine or any other citizen to carry for the rest of our lives from those in law who decided to disobey their Constitutional oaths on their very own.

Petitioner is presenting this petition to the United States Supreme Court as a natural born citizen with generations of natural born citizens on both sides of my family. Also, presenting and using this opportunity to speak for other citizens with similar abusive and disproportionate court cases, because having two cases on appeal, at the same time with identical vile judicial violations, indicates a strong possibility of similar abusive cases nationwide.

REASON FOR GRANTING PETITION

US Supreme Court Nudd v. Burrows, 91 U.S 426. "Fraud vitiates everything."

This case is of exceptional importance to citizens who have been denied their fundamental rights to equality and Due Process of the Laws. Moreover, this case is crucial in the protection of citizens Federal and Constitutional Rights when facing Judicial misconducts because of the clear intent and extreme level of known willful intentional violations. Gone without superior authoritative corrections since 2018 appeal. A corrective decision in this extreme case from the U.S. Supreme Court will not only strengthen citizens protection of our rights under our Constitution but will further provide enforcement to those in law knowingly and willfully disobeying the law nationwide, to not steer from the Rule of Law.

In this case, a chain-reaction effect. Trial court willfully elected to violate the Rule of Law-multiple violations, violations mount up after going against the Rule of Law, triggering a disregard for Petitioners Rights to a fair trial and Due Process of the Laws from multi-level cover-up being the violators only concern. **Withrow v. Larkin, 421 U.S. 35, 47 (1975)** *Bias or prejudice of an appellate judge can also deprive litigant of due process.*

Court of Special Appeals of Maryland opinion erroneously omitted several factual issues Petitioner presented in Briefs while dismissing a U.S. judge not reading the Maryland Pattern of Jury Instructions. Also, trial judge blatant bias throughout trial.

Omitting the significant issue with juror #13, #17, #18 not involved in jury selecting, judge/attorneys not asking any questions, per PGCCC transcript, 3 jurors only appearing in transcript when trial judge selects them. Any other U.S. court would be a mistrial.

Significant with CSAM opinion overlooking CLG other confessions causing injuries, color contrast and pattern difference of which both CLG and PCC bonded constructions created. One party/One-Step did not create the bonded code violations and variance (color/pattern) themselves. I was at location during injuries, decision makers were not. I argued in briefs the height variant did contribute to the fall with 1st step deeper and 2nd step shorter and blending. All three a horrible mixture. For years, everyone looking at picture shakes head, nearly all say, "that is so not fair." The psychedelic pattern, difference in color, and the deep first step continuing to trip people. I wish I took off that day.

Significant to this case, peremptory challenges removed both the same race and same genders – White Men, White Women, also Black Men from jury pool. Also significant, trial judge selected 6 jurors consisting of 5 Black Women (same race and gender). Against the U.S. Supreme Court rulings on peremptory challenges discriminately selecting race or gender.

Significant to this case, returning deliberating jurors returning to courtroom to ask court 3 questions, not answered, told get back make a decision, then court erroneously did not record, and did not docket a U.S. trial court event with witnesses.

Petitioner also introduced an important safety question concerning construction of stairways to prevent injuries. With important everyday public use on stairways, Reuters.com states about 3,000 stair-related injuries per day (1-injury every 30 seconds). Also deaths. With an authoritative decision stipulating if only two-steps are bonded together, constructed by separate construction companies, by being bonded creates 1-stairway, both parties are to be heard at trials in order to determine fault and neglect of code violations, simply because measuring for code violations needs 2 or more. Removing one of the bonded steps creates an unfair/possibly unlawful domino effect removal of substantial evidence discriminately. Similar to the Batson v. Kentucky challenge, removing a category of people based on race, gender (in this case race and gender), removing one of the only two steps also discriminately removes supporting evidence for one-party, the injured claimant.

Significant to this case, trial judge massive removal of Petitioners crucial case evidence by removing one of the only two-steps by removing PCC who constructed the stoop/porch at beginning of trial from Mr. Finnegan conversation with PCC stating twice, no dispute with material evidence as indicated in the transcript. Leaving only **one-step**

to begin a liability trial with code violations is discriminatory and excessive abuse of discretion infringes on Petitioners Due Process rights.

CSAM opinion also erroneously misplacing trial attorney Kevin Finnegan quote and steering it as if Petitioner made statement at trial (leading as if I were pro se at trial/not mentioning trial attorney in opinion) on page 4 claiming "Mallard... specifically stated she... [did] not dispute anything PC just said as far as the facts." Further missing the precise type of facts. Kevin Finnegan said "material fact" which can dismiss a party from trial. The reason trial court dismissed PC without fact checking. CSAM opinion as well as leaving out Petitioners Constitutional items, swayed and navigated opinion, formulating to paint a totally different narrative than the reason for Petitioner's appeal. If courts fairly displayed the actual briefs submitted along with their opinions, steering from appealed issues probably would not exist much.

Lastly, yet significant for pro se. We are dismissively treated in court while we struggle to learn a different world, along with injuries and missing time not even seeing our own lives. Most like myself, not enjoying a second of being pro se but we see our cases stopped being about us years ago. We are fighting for citizens rights. For a pro se who had a trial attorney that did not zealously represent nor protect our case or preserving issues, put the already unequal and disadvantage pro se in a really bad situation on appeal. Petitioner presents a question in this petition asking for our rights to be protected. For example, when trial attorney did not preserve issues, on appeal

claimant is now pro se. Through learning, realizing court errors and not at all our faults not preserving. 1. We went to trial with an attorney and do not know the law. 2. Seems triple unjust for a pro se to be penalized for something out of our control and in the hands of a stranger, an attorney. If a crime, rule, law... was violated, the court should want to seek justice and corrections. Pro se should have trial violative issues protected under the law as well as a no abuse clause nationwide.

Citizens need to have faith in court systems. We cannot afford for belief to deteriorate. Nationwide and worldwide people stand up for our Rights. In the United States, we have protections under our Constitutional rights, Federal, and the Rule of Law. So, why must we fight for something we already have?

Attorneys nationwide are floored when they hear about my abusive cases, saying this is extreme. As my Dad keeps telling me, they all know exactly what they are doing.

Earlier in petition, I asked "But why" the continued layering of violations, the willful collaboration of known violations, after years cover-up at my expense (more ways than can count).

As mentioned earlier, the "but why" lies within the intent, and the intent is to get Respondents out of their proven negligent code violations, confessions, at whatever cost, denying my medicals for over 30-Diagnosed Injuries with Life-Long pain, muscle spasms, ligaments, tendons, nerve damages..., deny me compensation for my pain and

suffering, deny my rightful Due Process on the merits of this case, violating my Civil Rights because I am a Black Woman.

The “but why” also lies within the “but for racism,” “but for discrimination,” “but for oppression.” Racism as an insecurity. All cultures are beautiful and different. That is how God made us, so how could one now admire.

Minorities have a history in the U.S. court receiving disproportionate treatment and disproportionate rulings, conflicting with our U.S. Constitution.

Is Due Process of the Law and the right to a Fair Trial for all citizens? Do the laws stand true for Blacks, Hispanics, Native Americans (1st on this land), and all other nationalities? The law says Equality. December 2021 will mark 7 ½ years since my work injuries. I have been in court ever since.

Article 7 of the 1966 International Covenant of Civil and Political Rights states that: “No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”

Article 10 (1) : “All persons deprived of their liberty shall be treated with *humanity* and with respect for the inherent...”

Decision can be reversed only if it is not supported by substantial evidence or if it is based on legal error. **Tackett v. Apfel**, 180 F.3d 1094, 1097 (9th Cir. 1999). Substantial evidence is defined as being more than a mere scintilla, but less than a preponderance. **Id. At 1098.** Substantial evidence is such relevant evidence as a 6 reasonable mind might

accept as adequate to support a conclusion. **Richardson v. Perales**, 402 U.S. 389, 401, 91 S.Ct. 1420 (1971).

Scheuer v. Rhodes 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974) Acted under state law in a manner violative of the federal Constitution, he came into conflict with the Constitutions' superior authority and was stripped of official character to consequences of his individual conduct.

Imagine someone telling you, by going to work, you will suffer Life-Long injuries and disabilities that will change your life, the courts will also viciously ignore and violate your born Constitutional Rights, and you will suffer further grief for years to come just from standing up for your Rights you already have, intentionally ignored to block your evidence, medicals, and justice to cover up those in law faults, not following the Rule of Law for personal gains through known willful acts of violations against the very same Constitution you are fighting to protect. And you ask, how long, and the person answers, there is no end date to fighting for our own Rights.

Imagine how powerful we could be as a human race if those who work on the destruction of our own sisters and brothers, join and work on uniting and supporting one another. This is the United States.

Petitioner is seeking from the superior Justices of the United States Supreme Court Constitutional rights breached, vacate judgement/opinion of Court of Special Appeals of Maryland and remand to the Court of Special Appeals of Maryland with instructions to direct the Circuit Court to vacate its judgments, a settlement hearing for Life-Long

medicals and all damages, and to enforce penalties as the Justices see fit to those in law who violated the U.S. Constitution, Federal Laws, and deprived Petitioner of her rights.

The Constitution of India under Articles 32 and 226 gives power to the Supreme Court and High Courts respectively to issue writs in cases of breach of Fundamental Rights of any citizen by the State. Such writs prevent arbitrariness and unchecked use of power.

My Constitutional Rights exist.

CONCLUSION

The petition for a writ of certiorari should be granted to protect Petitioners born rights under the U.S. Constitution.

Respectfully submitted.



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